

August 3, 2018

Via ECFS

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington DC 20554

Re: Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless

E911 Location Accuracy Progress Report

PS Docket No. 07-114

Womble Bond Dickinson (US) LLP

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Dear Ms. Dortch:

Pursuant to 47 C.F. R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless, is its E911 location accuracy progress report.

Should you have any questions, please contact undersigned counsel.

Best regards,

Womble Bond Dickinson (US) LLP

/s/ Michael R. Bennet

Michael R. Bennet Partner

Attachment

Before the

Federal Communications Commission

Washington, DC 20554

In the Matter of)	
)	
Wireless E911 Location Accuracy Requirements	PS Docket No. 07-114

<u>Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless E911 Location Accuracy 36 Month</u> Progress Report

Texas RSA 15B2 Limited Partnership d/b/a Five Star Wireless ("Five Star"), pursuant to Section 20.18(i)(4)(ii) of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its 36 month progress report.

Five Star is a small non-nationwide CMRS carrier and does not provide service in any of the top 50 CMAs. Five Star entered into a services agreement with West Safety Services ("West") for infrastructure, software and services to enable Five Star to provide enhanced 911 ("E911") location data to E911-capable public safety answering points ("PSAPs"). Five Star has utilized the Location Performance Management ("LPM") tool provided by West to ensure compliance with location accuracy requirement of Section 20.18(i)(2)(i)(B)(2) of the FCC's rules. The LPM allows users to optimize network accuracy and identify areas for improvement. Its performance monitoring and reporting tools identify location performance issues and provide reports that allow for auditing key performance indicators and call results and analyze location server performance. The LPM provides live call data reports, 50 meter accuracy reports, and PSAP reports consistent with ATIS's 05000031 recommendation.

Although Five Star complies with the current location accuracy benchmark, it has been working to improve its location accuracy and installed a new server during the fourth quarter of 2017. Five Star plans to do further testing and site certification to determine if additional measures are necessary to meet applicable future indoor horizontal location accuracy benchmarks, and then make network improvements and adjustments to existing sites as necessary. Five Star will make available to PSAPs uncompensated barometric pressure data for any 911 call placed from any handset offered by Five Star that has the capability to deliver barometric sensor data. Because Five Star does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.

Mike Higgins, Jr.

General Manager

Date: August 2, 2018